

1 THE O'MARA LAW FIRM, P.C.  
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5 *Attorneys for Plaintiffs*

8 UNITED STATES DISTRICT COURT  
 9 FOR THE DISTRICT OF NEVADA

11 DANIEL SMALL, CAROLYN  
 12 SMALL, WILLIAM CURTIN, DAVID  
 13 COHEN, LANETTE LAWRENCE and  
 LOUISE COLLARD, Individual and on  
 Behalf of All Other Persons Similarly  
 Situated,

14 Plaintiffs,

15 v.

16 UNIVERSITY MEDICAL CENTER  
 17 OF SOUTHERN NEVADA, a political  
 18 subdivision of Clark County, State of  
 Nevada, CLARK COUNTY, a political  
 19 subdivision of the State of Nevada, and  
 JOHN ESPINOZA, an individual,

20 Defendants.

Case No.: 2-13-cv-0298-APG-PAL

**JOINT STIPULATION AND  
~~PROPOSED~~ ORDER SETTING  
 BRIEFING SCHEDULE FOR  
 DEFENDANTS' MOTION  
 DISMISS**

23 IT IS HEREBY STIPULATED AND AGREED by plaintiffs Daniel Small,  
 24 Carolyn Small, William Curtin, David Cohen, Lanette Lawrence, and Louise  
 25 Collard (collectively "Plaintiffs") and defendants University Medical Center of  
 26 Southern Nevada and John Espinoza ("Defendants"), through their respective  
 27 counsel, as follows:  
 28

1 WHEREAS, on February 22, 2016, defendant University Medical Center of  
2 Southern Nevada filed its motion to dismiss Plaintiffs' third amended class action  
3 complaint ("Motion");

4 WHEREAS, on March 2, 2016, defendant John Espinoza filed a joinder to  
5 the Motion which included arguments that further elaborated on those set forth in  
6 the Motion;

7 WHEREAS, counsel for Defendants and Plaintiffs have met and conferred  
8 and agreed to the briefing schedule for the Motion.

9 **STIPULATION**

10 NOW, THEREFORE, the Parties, through their respective counsel of record,  
11 hereby respectfully stipulate and request as follows:

12 IT IS STIPULATED, BY AND BETWEEN THE PARTIES, AS  
13 FOLLOWS:

- 14 1. The Opposition to the Motion shall be filed no later than March 23,  
15 2016; and  
16 2. The Reply to the Motion shall be filed no later than April 6, 2016;

17  
18 IT IS SO STIPULATED.

19  
20 Dated: March 7, 2016

THE O'MARA LAW FIRM, P.C.

21  
22 **SO ORDERED.**

By: /s/ David C. O'Mara  
David C. O'Mara

23  
24   
UNITED STATES DISTRICT JUDGE

25 Dated: March 9, 2016.

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*Attorneys for Plaintiffs*

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28 JOINT STIPULATION AND [PROPOSED] ORDER SETTING  
BRIEFING SCHEDULE FOR DEFENDANT'S MOTION TO DISMISS

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Dated: March 7, 2016

LEWIS BRISBOIS BISGAARD & SMITH  
LLP

By: /s/ Margaret Foley

Margaret Foley

6385 S. Rainbow Boulevard, Suite 600

Las Vegas, Nevada 89118

Telephone: (702) 863-3383

Facsimile: (702) 893-3789

*Attorneys for Defendants*

**IT IS SO ORDERED.**

DATED: \_\_\_\_\_

\_\_\_\_\_  
Honorable Andrew P. Gordon

United States District Court Judge

JOINT STIPULATION AND [PROPOSED] ORDER SETTING  
BRIEFING SCHEDULE FOR DEFENDANT'S' MOTION TO DISMISS